

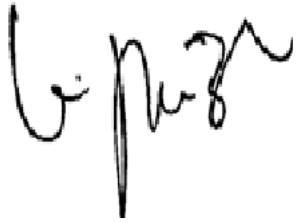
Palani Karupaiyan et al V Experis Et al	In the United States Dist Court for SDNY Docket 21-cv-04675-LGS
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Plaintiff Reply To Experis' opposition –ECF-82

- 1) Second Circuit Judge Katherine P Failla, in CVS Health defending case gave me opportunity that I should take deposition against the defendants with recording on the phone. Also Judge Failla suggested that I can use court room. Or I can take over zoom also possible.
- 2) Tamil Interpreter is not required
 - a) During the recruitment process, there was not any interpreter between Plaintiff and Moore.
 - b) Hon Judge Failla heard this plaintiff twice without tamil interpreter.
 - c) When Experis took deposition, plaintiff did not requested the interpreter.
 - d) When CVS health case, there was not an interpreter.
- 3) When Mr Prising was excluded in the deposition, this court order why Ms Moore can not testify the request should be put to Mr Prising.
- 4) Now further the defendants come up with Ms Moore will not take deposition because of the defendant placed the foreigner against the US citizen employment which perjury.
- 5) Simply to avoid the defendant to take oath and testify the defendants were objecting which unfair justice.
- 6) The plaintiff pray this court that Circuit Judge Hon Failla gave opportunity to this plaintiff to take deposition on recording the voice on phone or similar recording devices.

- 7) Deposition is integrative away of question. This interactive questionnaire cannot be done in plain paper questions.
- 8) So plaintiff pray this court to reject the Experis opposition and give opportunity to the plaintiff to take deposition Ms Moore on zoon and record the voice conversation.

Respectfully submitted.

A handwritten signature in black ink, appearing to read 'Palani Karupaiyan', with a stylized, cursive script.

Palani Karupaiyan

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Copy to defendant attorney Mr Joseph and Ms Lisa thru email